



6. In exchange for Zipit's agreement, defendant Blackberry Limited has agreed to waive service of the Summons and Complaint and to deem that service on Blackberry Limited had occurred on November 6, 2013.

7. If the Court grants this motion for an extension of time, the new deadline for Defendants to answer or otherwise respond to the Complaint would be January 13, 2014.

8. Defendants have not yet retained local counsel for this action. Accordingly, Plaintiff Zipit is filing this motion pursuant to Defendants' request. Defendants have consented to this motion and the extension requested herein.

WE CONSENT:

ROPES & GRAY LLP

/s/ SIGNATURE \_\_\_\_\_  
Andrew N. Thomases (Fed. ID No. \*\*\*\*\*)  
(*Pro hac vice* application to be filed)  
Email: Andrew.Thomases@ropesgray.com  
1900 University Avenue 6th Floor  
East Palo Alto, CA 94303-2284  
Telephone: (650) 617 4000  
Facsimile: (650) 617 4090  
*Attorneys for Defendants*

Gene W. Lee (Fed. ID No. \*\*\*\*\*)  
(*Pro hac vice* application to be filed)  
Email: Gene.Lee@ropesgray.com  
ROPES & GRAY LLP  
1211 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 596-9000  
Facsimile: (212) 596-9090  
*Attorneys for Defendants*

Greenville, South Carolina  
Dated: November 25, 2013

WE MOVE:

FOSTER LAW FIRM, LLC

/s/ SIGNATURE /s/ Robert P. Foster \_\_\_\_\_  
Robert P. Foster (Fed. ID No. 873 )  
Email: rfoster@fosterfoster.com  
601 East McBee Avenue, Suite 104  
Greenville, SC 29601  
Telephone: (864) 242-6200  
Facsimile: (864) 233-0290  
*Attorneys for Plaintiff*

Stephen R. Risley (Fed. ID No. \*\*\*\*\*)  
(*Pro hac vice* application to be filed)  
Email: srisley@srtslaw.com  
SMITH RISLEY TEMPEL & SANTOS LLC  
Two Ravinia Drive, Suite 700  
Atlanta, GA 30346  
Telephone: (770) 709-0022  
Facsimile: (770) 804-0900  
*Attorneys for Plaintiff*